

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**IN RE:**

**FANJOY CO.,**

**Debtor.**

**CHAPTER 11  
SUBCHAPTER V**

**CASE NO. 23-57565-PWB**

**MOTION REQUESTING EXTENSION OF TIME TO  
FILE SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

COMES NOW Fanjoy Co. (“Debtor”) and hereby files this “Motion Requesting Extension of Time to File Schedules and Statement of Financial Affairs” (“Motion”). In support of the Motion, Debtor shows the Court as follows:

1. On or about August 8, 2023, (“Petition Date”), Debtor filed a petition for relief under Chapter 11 of Title 11, United States Code, 11 U.S.C. §§ 101 et seq. (as amended, modified or supplemented, the “Bankruptcy Code”). Tamara Miles Ogier has been appointed as Subchapter V Trustee.

2. The voluntary petition was accompanied by a list of the names and addresses of Debtor’s twenty largest unsecured creditors.

3. The time to file the Statement of Financial Affairs, List of Executory Contracts, Schedules, and Statement of Income and Expenses, and financial reports (collectively, the “Schedules”) will expire on August 22, 2023.

4. Debtor requests through and including September 28, 2023, within which to file said Schedules. The additional time will provide the Debtor with an opportunity to thoroughly prepare the Schedules and will result in an accurate reporting of the information required to be disclosed therein.

5. The meeting of creditors has been scheduled for September 6, 2023. The extension of time requested herein should not adversely impact the creditor meeting. Debtor's attorney will serve a copy of the Schedules on the United States Trustee assigned to supervise this case upon filing.

WHEREFORE, Debtor requests entry of an order granting this Motion and such other and further relief as is deemed appropriate by the Court.

Respectfully submitted this 21st day of August, 2023.

**JONES & WALDEN LLC**

/s/ Leslie M. Pineyro

Leslie M. Pineyro

Georgia Bar No. 969800

699 Piedmont Ave. NE

Atlanta, Georgia 30308

(404) 564-9300

[lpineyro@joneswalden.com](mailto:lpineyro@joneswalden.com)

Proposed Attorney for Debtor

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CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing Motion using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of and an accompanying link to the Motion to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing Program:

- **Thomas Dworschak** thomas.w.dworschak@usdoj.gov, ltctommyd@aol.com
- **Alison Elko Franklin** franklinae@gtlaw.com, fieldss@gtlaw.com, brattons@gtlaw.com
- **Gary W. Marsh** gary.marsh@troutman.com, wlbank@troutman.com
- **Tamara Miles Ogier** tmo@oratl.com, jc@oratl.com; tmo@trustesolutions.net
- **Pierce Rigney** pierce.rigney@troutman.com

This 21st day of August, 2023.

**JONES & WALDEN LLC**

/s/ Leslie M. Pineyro

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Proposed Attorney for Debtor